

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOWEN, MICLETTE, & BRITT
INSURANCE AGENCY, LLC, BOWEN,
MICLETTE, & BRITT OF
LOUISIANA, LLC, and DAVID B.
GORNEY,

Plaintiffs,

vs.

MARSH USA INC. and MARSH &
MCLENNAN COMPANY

Defendants.

Case No. 15-cv-07434 (PAE) (JCF)

**DECLARATION OF CLIFFORD R.
ATLAS IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS' COMPLAINT**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

1. I am a Shareholder with the law firm of Jackson Lewis P.C., attorneys for Defendants Marsh USA Inc. and Marsh & McLennan Companies, Inc. (incorrectly named herein as "Marsh & McLennan Company"), in the above-captioned matter. As such, I am fully familiar with the facts and circumstances of this action.

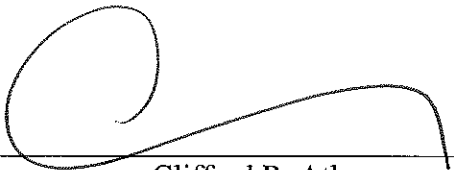
2. This declaration is submitted in support of Defendants' Motion to Dismiss Plaintiffs' Complaint, in its entirety, with prejudice, and for such other and further relief as the Court deems just and proper.

3. Attached as Exhibit "A" is a true and correct copy of Plaintiffs' Complaint, which originally was filed in Texas state court, Bowen, Miclette, & Britt Insurance Agency, LLC, et al. v. Marsh USA Inc., et al., Civil Action No. 2015-39564.

4. Attached as Exhibit "B" are true and correct copies of the unreported cases cited in Defendants' memorandum of law in support of their motion to dismiss.

I declare under the penalty of perjury that the forgoing is true and correct.

Dated: October 1, 2015
New York, New York



Clifford R. Atlas